



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

June 21, 2024

### **VIA E-MAIL**

Kurt Hopkins  
Duke Energy Indiana, LLC  
Cayuga Generating Station  
3300 North State Road 63  
Cayuga, Indiana 46392  
[Kurtis.Hopkins@duke-energy.com](mailto:Kurtis.Hopkins@duke-energy.com)

Re: **Inspection Summary Letter**  
Solid Waste Program ID 83-12

Dear Mr. Hopkins:

On June 18, 2024, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Duke Energy Cayuga Restricted Waste Site Type I Landfill, located at 3300 N SR 63, Cayuga, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	Routine
Results of Inspection:	No violations were observed (see attached inspection report).

Please direct any questions regarding this letter to Hunter Pace at (317) 508-1206 or [hpace@idem.IN.gov](mailto:hpace@idem.IN.gov).

Sincerely,

Hunter Pace, Environmental Manager  
Industrial Waste Compliance Section  
Compliance Branch  
Office of Land Quality

Enclosure  
cc: Vermillion County Health Department



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*





# RESTRICTED WASTE SITE TYPE I OR II INSPECTION REPORT

State Form 53908 (1-09)  
INDIANA STATE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT  
Industrial Waste Compliance Section  
Office of Land Quality  
100 N. Senate Ave.  
Mail Code 65-45  
Indianapolis, IN 46204-2251

**Facility Name** Duke Energy Cayuga RWS Type I Landfill

**EPA Identification Number:** IND000718122

**Location:** 3300 N SR 63

**City:** Cayuga

**County:** Vermillion

**ZIP Code:** 46392

**Inspector:** Hunter Pace

**Inspection Date** (month, day, year): June 18, 2024

**Other IDEM Representatives:** Molly Matzen

**Primary contact during inspection:** Tracey Osborn

## A. Pre-Inspection File Review

**On-Site Disposal Notification Date** (month, day, year) NI

**Restricted Waste Site Facility Type/Issuance Date** (month, day, year) Solid Waste Program ID 83-12, Type I/Issued April 12, 2024 (IDEM Virtual File Cabinet [VFC] Document #83624449). This permit will expire on April 12, 2029.

**Restricted Waste Site Permit Reviewed by Inspector Date** (month, day, year) June 18, 2024

### Wastestream(s) permitted for disposal generated by facility

Wastestream(s) Classified	Classification Number	Expiration Date(s) (month, day, year)
Flue Gas Desulfurization (FGD) Sludge FGD Synthetic Gypsum Bottom Ash Fly Ash	None of these waste streams have been waste classified. Pursuant to 329 IAC 10-9-4(d), these wastes are not required to be waste classified since they are being disposed of in a Type I Restricted Waste Site.	N/A
Coal Fines Claricone Solids	WC No. 23-26 WC No. 23-27	February 28, 2029 February 28, 2029

**Other wastestream(s) approved for disposal (such as those generated by other facilities):** N/A

**Treated wastestream(s) {hazardous or non-hazardous}:** N/A

**Previous Inspections:** March 26, 2024

**Unresolved violations/comments:** No unresolved violations.

## B. Restricted Waste Site Inspection Comments

### Background/Process Information

Duke Energy Cayuga Restricted Waste Site (RWS) Type I Landfill is approved to accept coal combustion residuals waste as part of the facility's power generating operations. The Cayuga Station power plant burns coal to generate electric power, which generates coal combustion residuals such as fly ash and bottom ash. These wastes, along with other wastes generated as part of the facility's processes, are disposed of in the facility's restricted waste site. The restricted waste site has 80 acres approved for filling and four cells total, two of which have been closed and two of which are approved for active disposal.

### Inspection Findings

On June 18, 2024, IDEM staff arrived at Duke Cayuga Generating Station to conduct a compliance inspection of the facility's Type I restricted waste site. IDEM staff presented credentials to the guard at the main gate and explained the purpose of the visit. IDEM staff were then met by facility staff, Mr. Tracey Osborn, who agreed to provide a driving tour of the facility's landfill and ash ponds.

IDEM staff began the inspection by driving to the facility's documentation trailer to inspect the facility's paperwork. Mr. Osborn provided IDEM staff with the facility's quarterly plot plan, landfill inspection logs, and operator licenses. All paperwork was completed correctly and was up to date. No issues were noted.

IDEM staff and Mr. Osborn began driving around the ash pond. IDEM staff observed well-established vegetation and no issues were noted. IDEM staff and Mr. Osborn continued to the landfill, where gypsum was being mined out of the landfill (See Photo Log, Photo 1). While driving around the perimeter of the landfill, IDEM staff observed well established vegetation and all waste was properly compacted with no fugitive dust issues. IDEM staff also observed a site benchmark and monitoring well MW-104, which was locked, labeled, and in good condition (See Photos 2 and 3).

IDEM staff and Mr. Osborn then returned to the main gate to conclude the inspection. IDEM staff stated that no issues were observed, thanked Mr. Osborn for his time, and then left the facility.

## C. Restricted Waste Site Inspection Summary

**C.1**

**Violations. The checklist below is not comprehensive, but includes the most common violations. Checked violations and additional violations are described in detail in Section C.2 and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section B, Restricted Waste Site Inspection Comments.**

<input type="checkbox"/> 1) Permit Compliance 329 IAC 10-13-4(c)	<input type="checkbox"/> 17) First Aid Kit 329 IAC 10-28-7(b)	<input type="checkbox"/> 33) Establish & Maintain Vegetation 329 IAC 10-28-14(b)
<input type="checkbox"/> 2) Established Roadways 329 IAC 10-28-1(a)	<input type="checkbox"/> 18) Communications System 329 IAC 10-28-7(c)	<input type="checkbox"/> 34) Proper Grading 329 IAC 10-28-14(c)
<input type="checkbox"/> 3) Restricted Access 329 IAC 10-28-1(b)	<input type="checkbox"/> 19) On-Site/Up to Date Plans 329 IAC 10-28-8(a)	<input type="checkbox"/> 35) Vegetation Clearing 329 IAC 10-28-14(d)
<input type="checkbox"/> 4) Passable Roads 329 IAC 10-28-2(a)	<input type="checkbox"/> 20) Quarterly Plot Plans 329 IAC 10-28-8(b)	<input type="checkbox"/> 36) Surface Leachate Management 329 IAC 10-28-15(a)
<input type="checkbox"/> 5) Tracking Mud 329 IAC 10-28-2(b)	<input type="checkbox"/> 21) Furnishing Records to IDEM 329 IAC 10-28-8(c)	<input type="checkbox"/> 37) Leachate 50 ft Beyond SW Boundary 329 IAC 10-28-15(b)
<input type="checkbox"/> 6) Monitoring Well Access 329 IAC 10-28-2(c)	<input type="checkbox"/> 22) Open Burning 329 IAC 10-28-9	<input type="checkbox"/> 38) Leachate Disposal 329 IAC 10-28-16
<input type="checkbox"/> 7) Signs 329 IAC 10-28-3	<input type="checkbox"/> 23) Waste Deposited in Water 329 IAC 10-28-10(a)	<input type="checkbox"/> 39) Groundwater Monitoring Wells 329 IAC 10-28-17
<input type="checkbox"/> 8) Livestock Present 329 IAC 10-28-4(a)	<input type="checkbox"/> 24) Cover Soil Type 329 IAC 10-28-11(a)	<input type="checkbox"/> 40) Explosive Gases 329 IAC 10-28-19
<input type="checkbox"/> 9) Vector, Dust, Odor 329 IAC 10-28-4(b)	<input type="checkbox"/> 25) Cover Maintenance/ Alt. Cover Approval 329 IAC 10-28-11(b)	<input type="checkbox"/> 41) Leachate Collection 329 IAC 10-28-20
<input type="checkbox"/> 10) Litter 329 IAC 10-28-4(c)	<input type="checkbox"/> 26) Working Face Size (RWS I Only) 329 IAC 10-28-12(a)(1)	<input type="checkbox"/> 42) Closure Performance Standards 329 IAC 10-30-1

<input type="checkbox"/> 11) Dead Animal Disposal 329 IAC 10-28-4(d)	<input type="checkbox"/> 27) Cover Application & Compaction (RWS I Only) 329 IAC 10-28-12(a)(2)	<input type="checkbox"/> 43) Final Cover (RWS I Only) 329 IAC 10-30-2(a)
<input type="checkbox"/> 12) Outside Containers 329 IAC 10-28-4(e)	<input type="checkbox"/> 28) Intermediate Cover (RWS I Only) 329 IAC 10-28-12(a)(3)	<input type="checkbox"/> 44) Top Soil (RWS I Only) 329 IAC 10-30-2(b)
<input type="checkbox"/> 13) Scavenging 329 IAC 10-28-5	<input type="checkbox"/> 29) Cover Application & Compaction (RWS II Only) 329 IAC 10-28-12(b)	<input type="checkbox"/> 45) Final Cover (RWS II Only) 329 IAC 10-30-3(a)
<input type="checkbox"/> 14) Salvage Operations 329 IAC 10-28-6(a)	<input type="checkbox"/> 30) Fugitive Dust 329 IAC 10-28-13(a)	<input type="checkbox"/> 46) Top Soil (RWS II Only) 329 IAC 10-30-3(b)
<input type="checkbox"/> 15) Salvage Storage 329 IAC 10-28-6(b)	<input type="checkbox"/> 31) Daily Cover/Control Plan 329 IAC 10-28-13(b)	<input type="checkbox"/> 47) Other
<input type="checkbox"/> 16) Safety Devices 329 IAC 10-28-7(a)	<input type="checkbox"/> 32) Cover Continuous Maintenance 329 IAC 10-28-14(a)	

<b>C.2</b>	<b>Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.</b>
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No violations were observed during the June 18, 2024, IDEM inspection.

<b>ATTACHMENTS:</b> <input type="checkbox"/> FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN  <input checked="" type="checkbox"/> PHOTO LOG  <input type="checkbox"/> ADDITIONAL DOCUMENTATION
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## Photo Log

### Photo 1



Facility Name: Duke Energy Cayuga RWS  
Type I Landfill

Photographer: Hunter Pace (IDEM)

Date: June 18, 2024

Others Present: Molly Matzen (IDEM), Tracey Osborn (facility)

Location & Description: Location of the facility's gypsum mining operations with landfill in the background.

### Photo 2



Facility Name: Duke Energy Cayuga RWS  
Type I Landfill

Photographer: Hunter Pace (IDEM)

Date: June 18, 2024

Others Present: Molly Matzen (IDEM), Tracey Osborn (facility)

Location & Description: Location of a site benchmark.

### Photo 3



Facility Name: Duke Energy Cayuga RWS  
Type I Landfill

Photographer: Hunter Pace (IDEM)

Date: June 18, 2024

Others Present: Molly Matzen (IDEM), Tracey Osborn (facility)

Location & Description: Location of MW-104.